

## **OBSERVATION REPORT #55**

**KPMG has observed several areas of Bell Atlantic non-compliance with industry change control policies.**

### **Issue**

Bell Atlantic's change control policies define intervals for notifying and documenting customer affecting changes. The intervals defined for Bell Atlantic initiated (Type 4) changes are:

1. CLECs are provided fifteen (15) business days of review and comment between the release of the initial documentation and final documentation.
2. Final documentation must be released forty-five (45) calendar days prior to the scheduled implementation date of the change item.

These intervals provide a minimum of sixty-six (66) days between the initial documentation release and the implementation date.

Based on a review of Type 4 changes implemented between October 1, 1999 – March 28, 2000, several areas of non-compliance with change control policies were noted:

1. In 14 of 29 cases (48%), documentation was released prior to the scheduled implementation date without providing the required fifteen (15) business days for CLEC review and comment.
2. In 28 of 29 cases (97%), final documentation for Type 4 changes was released prior to the scheduled implementation date without providing the required forty-five (45) calendar days notification.

Bell Atlantic appears to regard changes to order flowthrough capability as non-interface affecting and therefore exempt from intervals applicable to interface affecting Type 4 changes. This distinction does not appear to be specified in the change control policy documentation. Since CLEC staffing and business operations could be impacted by enhancements or other changes in order flowthrough capability, such changes may be interface affecting. If it is assumed that notification and documentation intervals apply to flowthrough changes, none of the nine (9) flowthrough changes examined met the required documentation interval.

### **Assessment**

CLECs may potentially be impeded from making timely changes to their systems and business processes in situations when Bell Atlantic does not provide timely notification and documentation about planned changes.

#	Change Request Number	Schedule Implementation Date	Type	Key Notification and Documentation Dates	Met 66 Day Notification Interval	(1) Met 15 Business Day Comment Interval <sup>1</sup>	(2) Met 45 Day Final Document Interval	KPMG Notes
1	803	2/19/00	4	Initial Documentation No <sup>2</sup>  Final Documentation No <sup>3</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) DTOHC – Listings Hot Cut Flowthrough - North
2	972	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>4</sup>  Final Documentation 2/16/00 <sup>5</sup>  Updated Implementation Date 2/18/00 <sup>6</sup>  Updated Implementation Date 2/27/00 <sup>7</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Active CIC Code in the North
3	975	2/19/00  2/27/00  3/1/00	4	Initial Documentation (LSOG4) 10/25/99 <sup>8</sup>  Final Documentation (LSOG4) 2/16/00 <sup>9</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>10</sup>  Updated Implementation (LSOG4) Date 2/27/00 <sup>11</sup>	Yes 10/25/99 – 3/1/00 (128/66d) LSOG4	Yes 10/25/99 – 2/16/00 (114/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG3/LSOG 4 Pre-Order Business Rules, EDI Specifications, and CORBA Specifications  Uniform Appointment Times North and South
4	977	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>12</sup>  Final Documentation 2/16/00 <sup>13</sup>  Updated Implementation Date 2/18/00 <sup>14</sup>  Updated Implementation Date 2/27/00 <sup>15</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Allow optional input of CUSCODE for Parsed and Unparsed CSRs
5	978	2/19/00  2/27/00	4	Initial Documentation 12/14/99 <sup>16</sup>  Final Documentation 2/16/00 <sup>17</sup>  Updated Implementation	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.

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		3/1/00		Date 2/18/00 <sup>18</sup> Updated Implementation Date 2/27/00 <sup>19</sup>				Remove SAPR and LAPR fields
6	1011	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>20</sup>  Final Documentation 2/16/00 <sup>21</sup>  Updated Implementation Date 2/18/00 <sup>22</sup>  Updated Implementation Date 2/27/00 <sup>23</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Remove the CAI field from Address Validation/TN Reservation
7	1016	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>24</sup>  Final Documentation 2/16/00 <sup>25</sup>  Updated Implementation Date 2/18/00 <sup>26</sup>  Updated Implementation Date 2/27/00 <sup>27</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Remove restriction on Route and Box in the North
8	1017	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>28</sup>  Final Documentation 2/16/00 <sup>29</sup>  Updated Implementation Date 2/18/00 <sup>30</sup>  Updated Implementation Date 2/27/00 <sup>31</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Change Translation of the TOS field to acceptable backend values
9	1018	2/19/00  2/27/00  3/1/00	4	Initial Documentation (LSOG4) 12/14/99 <sup>32</sup>  Final Documentation 2/16/00 (LSOG4) <sup>33</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>34</sup>  Updated Implementation	Yes 12/14/99 – 3/1/00 (78/66d) LSOG4	Yes 12/14/99 – 2/16/00 (64/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG4/ LSOG3 Pre-Order Business Rules  Make the Yellow Light Response Green for North

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				(LSOG4) Date 2/27/00 <sup>35</sup>				
10	1019	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>36</sup>  Final Documentation 2/16/00 <sup>37</sup>  Updated Implementation Date 2/18/00 <sup>38</sup>  Updated Implementation Date 2/27/00 <sup>39</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Rules, EDI Specifications, and CORBA Specs.  Make LA Zip Code 12 bytes across all Pre-Order
11	1020	2/19/00  2/27/00  3/1/00	4	Initial Documentation (LSOG4) 10/25/99 <sup>40</sup>  Final Documentation (LSOG4) 2/16/00 <sup>41</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>42</sup>  Updated Implementation (LSOG4) Date 2/27/00 <sup>43</sup>	Yes 10/25/99 – 3/1/00 (128/66d) LSOG4	Yes 10/25/99 – 2/16/00 (114/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG3/LSOG 4 Pre-Order Business Rules, EDI Specifications, and CORBA Specifications  Make WTN Search on BLOB CSR Common (Pre-Order)
12	1022	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>44</sup>  Final Documentation 2/16/00 <sup>45</sup>  Updated Implementation Date 2/18/00 <sup>46</sup>  Updated Implementation Date 2/27/00 <sup>47</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Loop Qual Basic – 2000 byte Response Parsed (Pre-Order)
13	1023	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>48</sup>  Final Documentation 2/16/00 <sup>49</sup>  Updated Implementation Date 2/18/00 <sup>50</sup>  Updated Implementation Date 2/27/00 <sup>51</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Change Name Field on Loop Qual Response to 25 Bytes
14	1025	2/19/00	4	Initial Documentation	Yes	Yes	No	LSOG4 Pre-

#	Change Request Number	Schedule Implementation Date	Type	Key Notification and Documentation Dates	Met 66 Day Notification Interval	(1) Met 15 Business Day Comment Interval <sup>1</sup>	(2) Met 45 Day Final Document Interval	KPMG Notes
		2/27/00  3/1/00		12/14/99 <sup>52</sup>  Final Documentation 2/16/00 <sup>53</sup>  Updated Implementation Date 2/18/00 <sup>54</sup>  Updated Implementation Date 2/27/00 <sup>55</sup>	12/14/99 – 3/1/00 (78/66d)	12/14/99 – 2/16/00 (64/21d)	2/16/00 – 3/1/00 (14/45d)	Order Business Rules, EDI Specifications, and CORBA Specs.  Change Expanded Options Indicator to a Default of “Direct”
15	1114	2/19/00  2/27/00  3/1/00	4	Initial Documentation None  Final Documentation None  Updated Implementation Date 2/18/00 <sup>56</sup>  Updated Implementation Date 2/27/00 <sup>57</sup>	No (0/66d)	No (0/21d)	No (0/45d)	Decommissioning of Non-LSRs
16	499	10/16/99	4	Initial Documentation 9/2/99 <sup>58</sup>  Final Documentation 9/2/99 <sup>59</sup>	No 9/2/99 – 10/16/99 (44/66d)	No (0/21d)	No 9/2/99 – 10/16/99 (44/45d)	Pre-Order Business Rules and EDI Specifications
17	890	10/16/99	4	Initial Documentation 10/7/99 <sup>60</sup>  Final Documentation 10/7/99 <sup>61</sup>	No 10/7/99 – 10/16/99 (9/66d)	No (0/21d)	No 10/7/99 – 10/16/99 (9/45d)	TIS Local Service Common Web GUI  Web GUI Phase III
18	842	10/30/99	4	Initial Documentation None  Final Documentation None	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) Resale to Loop w/LNP migrations - North
19	1053	10/30/99	4	Initial Documentation 10/28/99 <sup>62</sup>  Final Documentation 10/28/99 <sup>63</sup>	No 10/28/99 – 10/30/99 (2/66d)	No (0/21d)	No 10/28/99 – 10/30/99 (2/45d)	(flowthrough) Modifications to Platform Flowthrough
20	1054	10/30/99	4	Initial Documentation 10/28/99 <sup>64</sup>  Final Documentation	No 10/28/99 – 10/30/99 (2/66d)	No (0/21d)	No 10/28/99 – 10/30/99 (2/45d)	(flowthrough) Error Messages

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				10/28/99 <sup>65</sup>				
21	1045	12/18/99	4	Initial Documentation None  Final Documentation None	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) Creation of EDI and Web Transaction Status Reports
22	1061	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>66</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration for Call Forward II
23	1062	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>67</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Partial Migration of Platform with no BTN changes
24	1063	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>68</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration of straight-line additional listings
25	1064	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>69</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration of straight-line additional listings with Ringmate and with adding Ringmate
26	906	12/18/99	4	Initial Documentation 12/6/99 <sup>70</sup>  Final Documentation 12/6/99 <sup>71</sup>	No 12/6/99 – 12/18/99 (12/66d)	No (0/21d)	No 12/6/99 – 12/18/99 (12/45d)	LSOG4 Pre Order Business Rules & EDI specs  XDSL Loop Qual- Addition

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								of X4 Valid Entry in ADSLQUALC D
27	973	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>72</sup>  Final Documentation 2/17/00 <sup>73</sup>  Updated Implementation Date 2/18/00 <sup>74</sup>  Updated Implementation Date 2/27/00 <sup>75</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/17/00 (65/21d)	No 2/17/00 – 3/1/00 (13/45d)	LSOG4 Order Business Rules and EDI Specifications  Standardize on YPPA Code for Directory Ordering/ Listing
28	870	10/16/99	4	Initial Documentation 9/2/99 <sup>76</sup>  Final Documentation 9/2/99 <sup>77</sup>	No 9/2/99 – 10/16/99 (44/66d)	No (0/21d)	Yes 9/2/99 – 10/16/99 (44/45d)	KPMG Exception 41
29	919	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>78</sup>  Final Documentation 2/16/00 <sup>79</sup>  Updated Implementation Date 2/18/00 <sup>80</sup>  Updated Implementation Date 2/27/00 <sup>81</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules and EDI specs.  Modify Loop Qualification transaction to allow inquiry by either QUALTEL or Address fields in order to accommodate UNE-Loop Scenario

<sup>1</sup> Approx. 21 calendar days.

<sup>2</sup> Industry Change Control February 2000

<sup>3</sup> Industry Change Control February 2000

<sup>4</sup> FLASH 12/14/99 bulletin “Part 3 of 8 :Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Pre-Order Business Rules, v 4.1.1 and EDI Specifications, v 4.1.1”

<sup>5</sup> FLASH 2/16/00 bulletin “Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2”

<sup>6</sup> FLASH 2/18/00 bulletin “LSOG 4 February Release Delayed One Week”

<sup>7</sup> FLASH 2/27/00 bulletin “February Release of LSOG4 Into Production”

<sup>8</sup> FLASH 10/25/99 bulletin “Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order Business Rules Version 4.1”

<sup>9</sup> FLASH 2/16/00 bulletin “Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2”

<sup>10</sup> FLASH 2/18/00 bulletin “LSOG 4 February Release Delayed One Week”

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- <sup>55</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>56</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>57</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>58</sup> FLASH 9/2/99 bulletin "2 of 7: Individual North Report for Bell Atlantic Pre-Order Business Rules, v 2.5.1"
- <sup>59</sup> FLASH 9/2/99 bulletin "2 of 7: Individual North Report for Bell Atlantic Pre-Order Business Rules, v 2.5.1"
- <sup>60</sup> FLASH 10/7/99 bulletin "Launch of the Web GUI Phase III (CR#890)"
- <sup>61</sup> FLASH 10/7/99 bulletin "Launch of the Web GUI Phase III (CR#890)"
- <sup>62</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>63</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>64</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>65</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>66</sup> Industry Change Control January 2000
- <sup>67</sup> Industry Change Control January 2000
- <sup>68</sup> Industry Change Control January 2000
- <sup>69</sup> Industry Change Control January 2000
- <sup>70</sup> FLASH 12/6/99 bulletin "Documentation: CR# 906: xDSL Loop Qual-Addition of X4 Valid Entry in ADSLQUALCD"
- <sup>71</sup> FLASH 12/6/99 bulletin "Documentation: CR# 906: xDSL Loop Qual-Addition of X4 Valid Entry in ADSLQUALCD"
- <sup>72</sup> FLASH 12/14/99 bulletin "Part 8 of 8: Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Order Business Rules v 4.1.1 and EDI Specifications v 4.1.1"
- <sup>73</sup> FLASH 2/17/00 bulletin "Type 1 Sev 2 - CR# 1300: Order Business Rules Clarifications"
- <sup>74</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>75</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>76</sup> FLASH 9/2/99 bulletin "7 of 7: Bell Atlantic's North Order Business Rules Version 1.7.1"
- <sup>77</sup> FLASH 9/2/99 bulletin "7 of 7: Bell Atlantic's North Order Business Rules Version 1.7.1"
- <sup>78</sup> FLASH 12/14/99 bulletin "Part 3 of 8 :Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Pre-Order Business Rules, v 4.1.1 and EDI Specifications, v 4.1.1"
- <sup>79</sup> FLASH 2/16/00 bulletin "Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2"
- <sup>80</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>81</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"